

# EXHIBIT A



PHILADELPHIA OFFICE  
CIRA CENTRE, 12TH FLOOR  
2929 ARCH STREET  
PHILADELPHIA, PA 19104-2891  
215.568.3100  
FAX: 215.568.3439

October 19, 2007

AMANDA M. KESSEL  
215-564-8996  
akessel@woodcock.com

***VIA EMAIL AND FIRST CLASS MAIL***

Michael A. Parks, Esq.  
Kirkland & Ellis LLP  
200 East Randolph Drive  
Chicago, IL 60601

Re: *TruePosition, Inc. v. Andrew Corp. (D.Del. 05-747)*

Dear Michael:

Enclosed please find a Notice of 30(b)(6) Deposition in Aid of Execution and Request for Production. TruePosition is willing to defer this discovery if Andrew satisfies the judgment or posts a bond sufficient to cover the judgment and post-judgment interest. We propose to schedule the deposition for sometime during the first week of December in Chicago. Please contact me at your earliest convenience to discuss these issues further.

Sincerely,

Amanda M. Kessel

Enclosure

cc: Andrew Lundgren, Esq. (via email only)  
Rachel Pernic Waldron, Esq. (via email only)  
James D. Heisman, Esq. (via email only)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>TruePosition, Inc.,</b>	)	
	)	
<b>Plaintiff/</b>	)	
<b>Counterclaim-Defendant,</b>	)	
	)	<b>Civil Action No. 05-00747(SLR)</b>
<b>v.</b>	)	
	)	
<b>Andrew Corporation,</b>	)	
	)	
<b>Defendant/</b>	)	
<b>Counterclaim-Plaintiff.</b>	)	
	)	

**NOTICE OF 30(b)(6) DEPOSITION IN AID  
OF EXECUTION AND REQUEST FOR PRODUCTION**

PLEASE TAKE NOTICE, that pursuant to Fed. R. Civ. P. 69(a), 26 and 30(b)(6), and in accordance with Superior Court of the State of Delaware Civil Rules 69(aa), 26 and 30(b)(6), commencing at 9:30 a.m. on December 4, 2007 at the law offices of Sidley Austin, One South Dearborn, Chicago, Illinois 60603, or at such other location, date and time as may be mutually agreed, and continuing from day-to-day until completed, the undersigned attorney will take the deposition of Andrew Corporation ("Andrew"). Pursuant to Fed. R. Civ. P. 30(b)(6), Andrew shall designate a corporate representative to testify regarding its financial condition and the contents of the documents described below. TruePosition requests that Andrew identify in writing to TruePosition, on or before November 19, 2007, the one or more officers, directors, managing agents, or other persons who consent to testify on its behalf and the matters on which each such person will testify with respect to the topics listed below. You are invited to attend and cross-examine.

**LIST OF DEPOSITION TOPICS**

1. The current financial condition of Andrew, i.e., the identification and location of all assets and liabilities.
2. The identification and location of Andrew's cash and cash equivalents.
3. The identification and location of any and all real estate and tangible property owned by Andrew.
4. All stocks, bonds and other investment vehicles owned by Andrew.
5. Andrew's \$250 million revolving credit facility, as identified in Andrew's Form 10-Q, dated Aug. 2, 2007.
6. The effect, if any, of the judgment entered in this litigation on the Agreement and Plan of Merger between CommScope, Inc. and Andrew.
7. Communications by and between CommScope and Andrew concerning satisfaction of the judgment entered in this litigation.
8. Communications by and between CommScope and Andrew concerning the issuance of a permanent injunction in connection with the judgment entered in this litigation.

**REQUEST FOR PRODUCTION**

Plaintiff requests, pursuant to Fed. R. Civ. P. 69(a) and 30, and in accordance with Superior Court of the State of Delaware Civil Rules 69(aa), 26 and 30(b)(6), that Andrew produce the following documents and things for inspection and copying by Plaintiff's attorney not later than ten (10) business days prior to December 4, 2007.

1. Documents sufficient to identify all of Andrew's assets (both tangible and intangible), the location of such assets and Andrew's debts.

2. Documents sufficient to identify Andrew's cash and cash equivalents and the location of Andrew's cash and cash equivalents.
3. Documents sufficient to identify all real estate and tangible property owned by Andrew.
4. Documents sufficient to identify all stocks, bonds and other investment vehicles owned by Andrew.
5. Documents sufficient to identify and reflect the current status of Andrew's \$250 million revolving credit facility, as identified in Andrew's Form 10-Q, dated Aug. 2, 2007.
6. Copies of Andrew's state and federal income tax returns for the last two years.
7. A copy of the Agreement and Plan of Merger between CommScope, Inc. and Andrew ("Agreement"), including copies of all exhibits to the Agreement, all documents referenced in the Agreement, and any amendments or modifications to the Agreement.
8. Any and all documents reflecting communications by and between CommScope and Andrew concerning satisfaction of the judgment entered in this litigation or the issuance of a permanent injunction in connection with the judgment entered in this litigation.

DATED: October 19, 2007

By:

  
CONNOLLY BOVE LODGE & HUTZ LLP  
James D. Heisman, Esq. (#2746)  
1007 N. Orange Street  
P.O. Box 2207  
Wilmington, DE 19899  
Telephone: (302) 658-9141  
Facsimile: (302) 658-5614

WOODCOCK WASHBURN LLP  
Paul B. Milcetic, Esq. (pro hac vice)  
Dale M. Heist, Esq. (pro hac vice)  
Kathleen A. Milsark, Esq. (pro hac vice)  
Lynn B. Morreale, Esq. (pro hac vice)  
Daniel J. Goettle, Esq. (pro hac vice)  
Amanda M. Kessel, Esq. (pro hac vice)  
Cira Centre, 12<sup>th</sup> Floor

2929 Arch Street  
Philadelphia, PA 19104  
Telephone: (215) 568-3100  
Facsimile: (215) 568-3439